

**Exhibit A**

**Proposed Order**

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

Caption in Compliance with D.N.J. LBR 9004-1(b)

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PLLC*

In re:

LTL MANAGEMENT LLC,<sup>1</sup>

Debtor.

Chapter 11

Case No.: 21-30589 (MBK)

Judge: Michael B. Kaplan

**Hearing Date and Time:**  
June 22, 2023 at 10:00 a.m.

**[PROPOSED] ORDER GRANTING MOTION  
OF AYLSTOCK, WITKIN, KREIS & OVERHOLTZ, PLLC  
FOR ALLOWANCE OF SUBSTANTIAL CONTRIBUTION CLAIM**

Upon the motion (the “Motion”)<sup>2</sup> for entry of an order (this “Order”) pursuant to section 503(b) of the Bankruptcy Code allowing payment or reimbursement of expenses incurred by

<sup>1</sup> The last four digits of the Debtor’s taxpayer identification number are 6622. The Debtor’s address is 501 George Street, New Brunswick, New Jersey 08933.

<sup>2</sup> Capitalized terms used but not otherwise defined herein have the meanings ascribed to such terms in the Motion.

Aylstock, Witkin, Kreis & Overholtz, PLLC (“AWKO”) in making a substantial contribution in the above-captioned case; and this Court having jurisdiction to consider the Motion in accordance with 28 U.S.C. § 1334; and the Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2) and that venue of this proceeding and the Motion in this District is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and appropriate notice of and opportunity for a hearing on the Motion having been given and no other or further notice being necessary; and upon the record herein; and the Court having determined that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor,

IT IS HEREBY ORDERED THAT:

1. The Motion is GRANTED as set forth herein.
2. The Debtor is authorized and directed to pay or reimburse AWKO in the amount of \$961,289 as soon as practicable, subject to entry of an unstayed order granting the Dismissal Obligations Motion.
3. The Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.

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